

#### THE COMMONWEALTH OF MASSACHUSETTS

# DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

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COMMISSIONER

July 13, 2006

Mr. Robert N. Werlin, Esq. Keegan Werlin LLP 265 Franklin Street Boston, MA 02110

RE: D.T.E. 06-40 NSTAR Electric Petition for Approval of Merger

Department's Third Set of Information Requests

Dear Mr. Werlin:

Enclosed please find the Department of Telecommunications and Energy's Third Set of Information Requests to Boston Edison Company, Cambridge Electric Light Company, Canal Electric Company, and Commonwealth Electric Company in the above-referenced proceeding. Please provide the requested answers by July 21, 2006. If you have any questions on this request, please contact me at (617) 305-3613.

Sincerely,

/s/

Joan Foster Evans Hearing Officer

cc. Mary L. Cottrell, Secretary Service List Staff as assigned

## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

### THIRD SET OF INFORMATION REQUESTS D.T.E. 06-40

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to Boston Edison Company ("Boston Edison"), Cambridge Electric Light Company ("Cambridge"), Canal Electric Company ("Canal"), and Commonwealth Electric Company ("Commonwealth") (jointly "NSTAR Electric" or "Companies") the following Information Requests.

### I. Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Companies in this proceeding.

- 1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
- 2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
- 3. These requests shall be deemed continuing so as to require further supplemental responses if the Companies or their witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
- 4. The term "provide complete and detailed documentation" means:
  - Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
- 5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
- 6. If the Companies find that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

7. If a question refers to an Information Request of another party, please provide that response and answer with information that supplements the previous response.

8. Please serve a copy of the responses on Mary L. Cottrell, Secretary of the Department; also submit two (2) copies of the responses to Joan Foster Evans, Hearing Officer, and one copy each to Paul Osborne, Meera Bhalotra, Jeff Hall and Joseph Passaggio of the Rates and Revenue Requirements Division, and Shashi Parekh of the Electric Power Division.

#### **II.** Information Requests

PTE 3-1 Refer to the Companies' response to information request DTE 1-2. Please reconcile the difference between the 354,533 common shares of Canal reported herein and the 1,523,000 common shares of Canal reported in Exh. NSTAR-CLV-2, at 1.

- DTE 3-2 Refer to the Companies' response to information request DTE 1-8. Are there any franchise rights and obligations currently held by Canal Electric that would also need to be confirmed as part of a merger?
- DTE 3-3 Refer to the Companies' response to information request DTE 1-8. Please provide the date the Companies and/or their predecessors were authorized to provide electric service, along with relevant citation, to the following towns:
  - (1) Aquinnah;
  - (2) Duxbury;
  - (3) Kingston;
  - (4) Marshfield:
  - (5) Scituate (Humarock Beach area);
  - (6) Truro; and
  - (7) Westport
- DTE 3-4 Refer to the Companies' response to information request DTE 2-1. Please provide, to the extent available, the estimated cost savings that are expected from the consolidation of Cambridge, Commonwealth, and Canal into NSTAR Electric.
- DTE 3-5 Refer to the Companies' response to information request DTE 2-1. Please provide, to the extent available, the estimated one-time legal and administrative costs associated with the consolidation of Cambridge, Commonwealth, and Canal into NSTAR Electric.
- DTE 3-6 Refer to page 1, line 6 of the attachment to the Companies' response to information request DTE 1-21. How much of the \$29,387,000 distribution revenue requirement results from the inclusion of the 13.8 kV facilities in rate base? Please provide all workpapers, schedules and assumptions.
- DTE 3-7 Please provide bill impacts for all customer classes incorporating all rate changes that are proposed in this filing. Use the *current* basic service rate for the "current" and "proposed" bills, but use the *proposed* consolidated basic service adder.

PTE 3-8 Refer to the Companies' response to information request DTE 1-13. Please provide the Department with the consolidated Basic Service adder that will be charged to customers if this filing is approved. Provide all workpapers, analysis, and data in Microsoft Excel format with links and formulas in cells.

- Potential Refer to the Companies' response to information request DTE 1-14. Please provide an example of the retail basic service rate derivation as stated in the original information request. Use the format of confidential Appendix B, Schedule A, replacing actual wholesale prices with anecdotal data. The Department understands that results of subsequent supply solicitations are not known at this time, and therefore requests that the Companies use anecdotal data for values resulting from the solicitation. For line losses and any other consolidated or averaged data, use actual data. Describe the process used to consolidate line loss data. Provide all workpapers, analysis, and data in Microsoft Excel format with links and formulas in cells.
- DTE 3-10 Refer to the Companies' response to information request DTE 2-3. Are the Companies anticipating any over/under recovery as a result of consolidating their depreciation rates but not making related changes to its distribution rate? If so, how and when does the Companies propose to reconcile this over/under recovery?
- DTE 3-11 Refer to Exh. NSTAR-CLV-1, at 35. Because individual retirements would not be recorded under the Companies' proposed depreciation arrangement, please discuss whether this would result in an acceleration of depreciation/amortization expense for ratemaking purposes.
- DTE 3-12 Refer to the Companies' response to information request DTE 2-7 (a). The diagram supplied is too small and not readable. Please provide a larger size of the same titled "Geographic System Diagram 115-13.8 kV Tie Lines Cambridge Electric Light Co. Rev 7-6-06."
- Possible 2-13 Refer to the Companies' response to information request DTE 2-7(a). Please provide a table that shows all 13.8 kV lines as Distribution Supply System "'DSS" lines or Distribution lines currently considered as transmission lines that, upon merger if approved, will be reclassified as Distribution lines. Please make separate tables for these lines by stations or area such as:
  - 1. Alewife Bulk #828
  - 2. Kendall #800
  - 3. Putnam Bulk #831
  - 4. East Cambridge #875

- 5. Prospect Bulk #819
- 6. Blackstone Street #801

PTE 3-14 Refer to the Companies' response to information request DTE 2-7(a). Please provide the current status of generation units in Cambridge's service territory such as Kendall CT, Kendall Steam Units #1, #2, #3 and Kendall Jet Units #1 and #2. Identify the number of hours in a year each unit supplies load under normal operation. Explain how and why, under normal operations for Cambridge's system, the megawatt output of these units would not affect the direction of power flows on the existing 13.8 kV lines.